

EXHIBIT A



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10 *Attorneys for Plaintiff*

11 UNITED STATES DISTRICT COURT

12 DISTRICT OF ARIZONA

13 Valentino Dimitrov, individually, and on
14 behalf of all others similarly situated;

15 Case No.: 2:23-CV-00226-PHX-DJH

16 Plaintiff,

17 vs.

18 Stavatti Aerospace, Ltd, a Minnesota
19 corporation; Stavatti Aerospace, Ltd, a
20 Wyoming corporation; Stavatti Corporation,
21 a Minnesota corporation; Stavatti Immobiliare
22 Ltd, a Wyoming corporation; Stavatti Industries,
23 Ltd, a New York corporation Stavatti
Super Fulcrum, Ltd, a Wyoming
corporation; Stavatti Ukraine, a Ukrainian
business entity; Stavatti Heavy Industries
Ltd, a Hawaii corporation; Christopher
Beskar and Maja Beskar, husband and wife;
Brian Colvin and Corrina Colvin, husband
and wife; John Simon and Jean Simon,
husband and wife; William McEwen and
Patricia McEwen, husband wife; Rudy
Chacon and Jane Doe Chacon, husband and
wife; and Does 1 through 10, inclusive,

24
25 **DECLARATION OF ROSS P. MEYER
IN SUPPORT OF MOTION TO DEEM
PLAINTIFF'S OPPOSITION TO
DEFENDANTS MOTION TO
SUMMARY JUDGMENT FOR
PLAINTIFF'S LACK OF STANDING
(DOC. 63) TIMELY AND RESPONSE
TO MOTION TO STRIKE (DOC. 65)**

26 Defendants.

27 I, Ross P. Meyer, declare as follows:

1 1. I am over the age of 18 and a resident of Arizona.

2 2. I am an attorney at Enara Law PLLC (“Enara Law”).

3 3. Since March 1, 2025, I am Enara Law’s managing attorney.

4 4. After taking over the role, undersigned counsel began reviewing and
5 updating firm policies, such as implementing a quarterly docketing calendar review and a
6 calendar review specific to the firm’s cases before this Court.

7 5. On June 6, 2025, the firm conducted its first quarterly review since
8 undersigned counsel’s appointment as Managing Attorney.

9 6. During that review, I instructed Associate Attorney Morgan E. Silva to
10 review this matter’s docket to determine whether an oral argument hearing had been set
11 on Defendants’ Motion for Summary Judgment to allow undersigned counsel adequate
12 time to begin preparing for such oral argument.

13 7. At that time, Ms. Silva alerted the firm that the Represented Defendants had
14 filed a Motion to Strike based on Mr. Dimitrov’s Opposition being filed five (5) days past
15 the deadline.

16 8. Upon an internal review, it was determined that the Firm Manager and
17 Senior Advanced Certified Paralegal, responsible for docketing all case deadlines, had
18 inadvertently selected Arizona Superior Court Rules instead of the Federal Rules to
19 calendar the Opposition deadline in the firm’s online Clio docketing system. Due to this
20 inadvertent error, the docketed date was set for April 9, 2025.

21 10. When the Motion to Strike and Reply was filed, Hannah Watts, Enara Law’s
22 Legal Assistant, saved the document to this matter’s folder in preparation for the oral
23 argument requested by Plaintiff in his Opposition.

24 11. Ms. Watts notified Ms. Silva and I that she saved the document to this
25 matter’s folder.

12. Generally, upon receipt of filings, Ms. Witgen or Ms. Watts save the filings to a matter's folder and place the filing in the Firm's Slack docketing thread for the filing response to be docketed. Ms. Watts did not place the Motion to Strike and Reply in the Firm's Slack docketing thread, not recognizing that a Motion to Strike had also been filed along with the Reply, requiring a docketing of the response.

13. Upon further review of the circumstances, it became clear that when the Motion to Strike and Reply was filed by Represented Defendants it was classified by this Court in the ‘Docket Text’ section as a Reply to Response to Motion. (the “Notice Email”)

14. Upon review of the Notice Email, I relied on the classification by this Court that the document was a Reply to Mr. Dimitrov's Opposition.

15. On June 6, 2025, Ms. Silva recognized that the ‘Docket Text’ had been amended to include the Motion to Strike. *See* Ex. F. The ‘Docket Text’ now reads as “*Motion to Strike 65 Response to Motion, Reply to Response to Motion. . . *Modified to add motion part on 4/25/2025 (EJA).”

16. At no time did I receive an updated Notice Email modifying the original 'Docket Text.'

17. In bringing this to the firm's attention, undersigned counsel has worked with staff and is currently working to implement additional check points to confirm accurate docketing, in addition to calendaring through Clio, weekly emails of all upcoming litigation deadlines, and an attorney-staff meeting in which the deadlines are specifically discussed.

18. I declare under penalty of perjury that the foregoing is true and correct.

DATED this 11th day of May 2025.

By:

R Mayer

Ross P. Meyer